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**REDACTED**

Attorneys for Defendant

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON

UNITED STATES OF AMERICA,

Plaintiff,

v.

PIROUZ SEDAGHATY,

Defendant.

CR 05-60008

THIRD SUPPLEMENT TO FIRST  
MOTION FOR DISCOVERY

Defendant Pirouz Sedaghaty, by and through his attorneys, Steven T. Wax,  
Federal Public Defender, and Lawrence Matasar, hereby files this Third Supplement to

First Motion for Discovery. Some of the material sought herein may be classified. This motion is made with the specificity set out below at this time based on the review of classified material and recent facts that have come to the defense through defense investigation. Mr. Sedaghaty was first provided access to classified material in late March 2010. He was able to review that material with an expert on April 11, 2010. As more fully set out in the declarations of William Teesdale and Walter Patrick Lang filed in support of this application, review of the classified material has enabled Mr. Sedaghaty to focus and sharpen previous discovery requests.

Mr. Sedaghaty does not believe that any information contained in this pleading is classified.

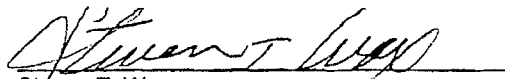
Mr. Sedaghaty requests an order from the Court directing the government to produce the following material, whether classified or unclassified:

1. Any and all information in whatever form contained in files of all government agencies, within the intelligence community or outside the intelligence community, including but not limited to the files of the CIA, FBI, NSA, DOD, National Counter Terrorism Center, and Departments of State and Treasury, relating to United States funding of Chechen mujahideen, either directly or indirectly, and/or through any Saudi Arabian entities including, but not limited to, Al Haramain, the Saudi Joint Relief Committee (SJRC), and/or the Saudi Arabian government or any entities thereof, or members of the Saudi Royal Family or other Saudi citizens.

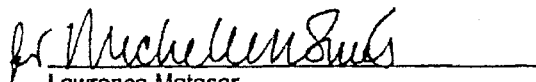
2. Any and all information in whatever form contained in files of all government agencies, within the intelligence community or outside the intelligence community, including but not limited to the files of the CIA, FBI, NSA, DOD, National Counter Terrorism Center, and Departments of State and Treasury, showing the relationship between the SJRC , Al Haramain, and the Saudi Arabian government, any entities of the Saudi Arabian government or the Saudi Arabian Royal Family and/or control over the SJRC by or through any Saudi Arabian entities or members of the Saudi Royal Family.
3. Any and all information in whatever form contained in files of all government agencies, within the intelligence community or outside the intelligence community, including but not limited to the files of the CIA, FBI, NSA, DOD, National Counter Terrorism Center, and Departments of State and Treasury, demonstrating that various branches of the United States government have found the Russian FSB to be unreliable.
4. Any and all information in whatever form contained in files of all government agencies, within the intelligence community or outside the intelligence community, including but not limited to the files of the CIA, FBI, NSA, DOD, National Counter Terrorism Center, and Departments of State and Treasury, that the United States government is in possession of copies of the receipts that the defense has marked at Exhibit 704 - 05 and the log book and affidavit marked as Exhibit 706 - 707, and has performed tests, examinations, or in other ways made efforts to determine their authenticity and has produced reports, scientific or otherwise, regarding the authenticity of those receipts and the results of any and all such activity.
5. Any and all information, or reports, in whatever form contained in files of all government agencies, within the intelligence community or outside the intelligence community, including but not limited to the files of the CIA, FBI, NSA, DOD, National Counter Terrorism Center, and Departments of State and Treasury, regarding interviews of any individuals associated or formerly associated with Al Haramain including, but not limited to, Aqeel al Aqeel, Mansour Al Kadi, Soliman Al Buthe, or any of the principals or former principals in Al Haramain.
  - a. The request for information, or reports, set out above includes information or reports of interviews conducted by United States personnel, United States contractors, other persons on behalf of the United States whether directly or indirectly and information or reports of interviews conducted by any person or entity in Saudi Arabia or any other country.

- b. The request for information, or reports, set out above includes any reports from any agencies regarding the originals of any such reports, any notes, and any information about destruction of those reports.
  - c. With respect to the reports mentioned in the preceding paragraph, provide any and all information regarding potential dissemination to any other agency, person, or entity that might still be in possession of any reports that were destroyed by any agency, person, or entity.
6. Any and all information in whatever form contained in files of all government agencies, within the intelligence community or outside the intelligence community, including but not limited to the files of the CIA, FBI, NSA, DOD, National Counter Terrorism Center, and Departments of State and Treasury, of all records of all bank accounts in any way related to or used by or on behalf of, Al Haramain Saudi Arabia from January 1, 1999, through December 31, 2000, whether in the name Al Haramain or any of its officers or employees, including, but not limited to, Aqeel al Aqeel, Mansour Al Kadi, Soliman Al Buthe, and the Al Rajhi bank account number 9889/5 referenced on Government Proposed Exhibit SW-5.
7. Any and all information in whatever form contained in files of all government agencies, within the intelligence community or outside the intelligence community, including but not limited to the files of the CIA, FBI, NSA, DOD, National Counter Terrorism Center, and Departments of State and Treasury, of all records of all transactions by Al Haramain Saudi Arabia with respect to providing money to any person or entity in Chechnya, directly or indirectly, from January 1, 1999, through December 31, 2000, whether in the form of a bank record or not.
8. Any and all information in whatever form contained in files of all government agencies, within the intelligence community or outside the intelligence community, including but not limited to the files of the CIA, FBI, NSA, DOD, National Counter Terrorism Center, and Departments of State and Treasury, of all records of all transactions by SJRC, or any person or entity action on its behalf, or any other Saudi Arabian person or entity, with respect to providing money to any person or entity in Chechnya, directly or indirectly, from January 1, 1999, through December 31, 2000, whether in the form of a bank record or not.

RESPECTFULLY SUBMITTED this 27<sup>TH</sup> day of April, 2010.



Steven T. Wax  
Federal Public Defender



Lawrence Matasar

Counsel for Defendant Pirouz Sedaghaty